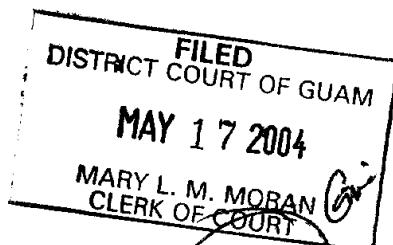


Joaquin C. Arriola
Anita P. Arriola
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street, Suite 201
Hagåtña, Guam 96910
Telephone: (671) 477-9730/33
Facsimile: (671) 477-9734



Counsel for Plaintiffs Alan Sadhwani, et al.

IN THE UNITED STATES
DISTRICT COURT OF GUAM

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

ALAN SADHWANI, LAJU SADHWANI,) CIVIL CASE NO. 03-00036
and K. SADHWANI'S INC., a Guam)
corporation,)
Plaintiffs,) PLAINTIFFS' EX PARTE MOTION
vs.) TO COMPEL DISCOVERY AND FOR
HONGKONG AND SHANGHAI BANKING) SANCTIONS (F.R.C.P. 37(d); L.R. 37.1)
CORPORATION, LTD., a Foreign)
corporation, JOHN DOE I through)
JOHN DOE X,)
Defendants.)

)

TO: DEFENDANT HONGKONG SHANGHAI BANKING CORPORATION
AND ITS COUNSEL OF RECORD BRONZE & TANG:

PLEASE TAKE NOTICE that Plaintiffs Alan Sadhwani, et al., will bring on for hearing
their *Ex Parte* Motion to Compel Discovery and for Sanctions, on _____, the
_____ day of May, 2004, at _____ .m., or as soon as the Court may schedule
the matter to be heard, in the U.S. District Court of Guam, 4th Floor, U.S. Courthouse,
520 West Soledad Avenue, Hagatna, Guam 96910.

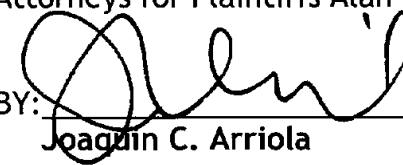
ORIGINAL

This *ex parte* application is based on Local Rules 7.1(j) and 37.1 of the Local Rules of the U.S. District Court of Guam, Rules 26 and 37 of the Federal Rules of Civil Procedure, and all of the pleadings and files in this matter.

This *ex parte* application is made because the discovery cut-off date set by the Scheduling Order of this Court is June 8, 2004, and the discovery and dispositive motion cut-off date is June 30, 2004, and thus it is urgent that this Motion be heard as soon as possible because of such discovery deadlines.

Dated this 17 day of May, 2004.

ARRIOLA, COWAN & ARRIOLA
Attorneys for Plaintiffs Alan Sadhwani, et al.

BY: 
Joaquin C. Arriola

CERTIFICATE OF SERVICE

I, JOAQUIN C. ARRIOLA, hereby certify that on May 17, 2004, I caused to be served, via hand delivery, a **PLAINTIFFS' EX PARTE MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS (F.R.C.P. 37(d); L.R. 37.1)** to:

Jacques A. Bronze, Esq.
BRONZE & TANG, P.C.
2nd Floor, BankPacific Building
825 S. Marine Drive
Tamuning, Guam 96913

Dated this 17 day of May, 2004.


Joaquin C. Arriola

(G:\PLEADING\ExParte-CompelDiscvry)